UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA	:	Mag. No. 15- 3528 (MF)
v.	:	Hon. Mark Falk
CHARLES STANGO, a/k/a "Beeps," FRANK NIGRO, a/k/a "Shipe," PAUL COLELLA, a/k/a "Knuckles," ANTHONY STANGO, a/k/a "Whitey," JOHN CAPOZZZI, a/k/a "Johnny Balls", MARIO GALLI, and NICHOLAS DEGIDIO	:	**CRIMINAL COMPLAINT**

I, Robert Conrad, being duly sworn, state the following is true and correct to the best of my knowledge and belief:

SEE ATTACHMENT A

I further state that I am a Special Agent with the Federal Bureau of Investigation, and that this Complaint is based on the following facts:

SEE ATTACHMENT B

continued on the attached page and made a part hereof.

Robert Conrad, Special Agent
Federal Bureau of Investigation

Sworn to before me and subscribed in my presence,
on 3/11/15, at Essex County, New Jersey

HONORABLE MARK FALK
UNITED STATES MAGISTRATE JUDGE

ATTACHMENT A

COUNT ONE

From on or about January 29, 2014 through on or about February 25, 2014, in District of New Jersey, and elsewhere, the defendants,

CHARLES STANGO, a/k/a "Beeps,"
FRANK NIGRO, a/k/a "Shipe,"
and
PAUL COLELLA, a/k/a "Knuckles,"

did knowingly use the mail and facilities in interstate and foreign commerce, to wit: interstate wire communications between Nevada and New Jersey; with the intent to commit a crime of violence that is, murder, contrary to N.J.S.A. 2C:11-3, to further unlawful activity of a business enterprise involving narcotics and controlled substance offenses and prostitution offenses, and to thereafter perform and attempt to perform the commission of that murder.

In violation of Title 18, United States Code, Section 1952(a)(2)(B) and Section 2.

COUNT TWO

From on or about December 15, 2014 through on or about March 13, 2015 in the Districts of New Jersey and Nevada and elsewhere, the defendant

CHARLES STANGO, a/k/a "Beeps,"

attempted to cause others to travel in interstate commerce from the State of Pennsylvania and the State of Rhode Island to the State of New Jersey with intent that the murder of Victim-1 be committed in violation of the laws of the State of New Jersey as consideration for the receipt of, and as consideration for a promise and agreement to pay, things of pecuniary value, to wit: $50,000.

All in violation of Title 18, United States Code, Sections 1958 and 2

COUNT THREE

From on or about February 14, 2015 through on or about March 8, 2015 in the District of New Jersey, and elsewhere, the defendants,

CHARLES STANGO, a/k/a "Beeps,"
and
ANTHONY STANGO a/k/a "Whitey,"

did knowingly use the mail and facilities in interstate and foreign commerce, to wit: interstate wire communications between Nevada and New Jersey, with the intent to promote, manage, establish, carry on or facilitate the promotion, management, establishment or carrying on of an unlawful activity, that is, prostitution, contrary to N.J.S.A. 2C:34-1 and to thereafter perform and attempt to perform the commission of said offense.

In violation of Title 18, United States Code, Section 1952(a)(3)(A) and Section 2

COUNT FOUR

From on or about December 12, 2014 through on or about March 13, 2014, in Union County, in the District of New Jersey and elsewhere, the defendants

CHARLES STANGO, a/k/a "Beeps,"
ANTHONY STANGO, a/k/a "Whitey,"
JOHN CAPOZZZI, a/k/a "Johnny Balls,"
MARIO GALLI,
and
NICHOLAS DEGIDIO,

did knowingly and intentionally conspire and agree with others to distribute 500 grams or more of cocaine, a Schedule II controlled substance, contrary to Title 21, United States Code, Section 841(b)(1)(B)(ii).

In violation of Title 21, United States Code, Section 846.

ATTACHMENT B

I, Robert Conrad, am a Special Agent with the Federal Bureau of Investigation ("FBI"). I have knowledge of the following facts based upon both my investigation and discussions with law enforcement personnel and other individuals. Because this affidavit is being submitted for the sole purpose of establishing probable cause to support the issuance of a complaint, I have not included each and every fact known to the government concerning this matter. Where statements of others are set forth herein, these statements are related in substance and in part. Where I assert that an event took place on a particular time or date, I am asserting that it took place on or about the time or date alleged.

THE DECAVALCANTE FAMILY OF LA COSA NOSTRA ENTERPRISE

1. Since approximately 2012, the FBI-Newark has conducted an investigation into the criminal enterprise known as the DeCavalcante Family of La Cosa Nostra (the "DCF"). During that time, the following subjects, among others, have been identified as having participated in the criminal activity of the enterprise:

a. CHARLES STANGO ("STANGO") is currently a "capo" or "caporegime" -or captain- in the DCF enterprise, and as such he has access to high–ranking members of the DCF enterprise. The investigation has revealed that STANGO is living in Henderson, Nevada and has utilized various cellular telephone facilities to engage in the affairs of the enterprise, including a murder conspiracy.

b. FRANK NIGRO, a/k/a "Shipe," ("NIGRO") is a "consigliere" of the DCF whose role is to be an advisor or counselor to other high-ranking members of the DCF.

c. PAUL COLELLA, a/k/a "Knuckles," ("COLELLA") is an associate of the DCF. As will be set forth more fully below, STANGO has contacted Colella to pass communications about a murder conspiracy on to higher ranking members of the DCF by use of a cellular telephone facility.

d. ANTHONY STANGO, a/k/a "Whitey," ("ANTHONY STANGO") is STANGO's son and an associate of the DCF.

e. JOHN CAPOZZI, a/k/a "Johnny Balls," (CAPOZZI) is an associate of the DCF engaged in the sale of controlled substances on behalf of the DCF.

f. MARIO GALLI (GALLI) is an associate of the DCF engaged in the sale of controlled substances on behalf of the DCF.

g. NICHOLAS DEGIDIO (DEGIDIO) is an associate of the DCF engaged in the sale of controlled substances on behalf of the DCF.

2. The DCF is an organized criminal group based in New Jersey that operates in the District of New Jersey and elsewhere. Currently, it appears that the DCF operates under the Gambino Family of La Cosa Nostra, one of the five major crime families based in New York City (the "Gambinos"). The DCF is referred to by its members in various ways, including as a "cosa nostra," a "family," and "this thing of ours." The DCF is part of a nationwide criminal organization known by various names, including the "Mafia" and "La Cosa Nostra," which operates through entities known as "Families." The DCF is an enterprise that engages in numerous criminal offenses, including fraud, distribution of controlled substances, prostitution, the sale of stolen and contraband goods, murder, assault, extortion, and other crimes of violence.

3. The DCF operates through groups of individuals known as "crews" and "regimes." Each "crew" has as its leader a person known as a "caporegime," "capo," or "captain," and typically consists of "made" members, sometimes known as "soldiers," "wiseguys," "friends of ours," and "good fellows." Other individuals, known as "associates," and sometimes referred to as "connected" or identified as "with" a soldier, participate in the various activities of the crews and its members.

4. The purposes of the DCF include the following:

a. Enriching the members of the enterprise through, among other things: (i) the extortionate control of businesses, persons, and property through threats of physical and economic harm; (ii) the financing, extension and collection of extortionate extensions of credit, commonly known as "loansharking" or "shylocking"; (iii) the control of businesses through the collection of loansharking debts; (iv) the operation of illegal bookmaking businesses; (v) the purchase and sale of stolen property and counterfeit goods; (vi) theft and robbery; (vii) the distribution of controlled substances; (viii) the operation of prostitution businesses; and (ix) securities fraud;

b. Preserving and augmenting the power, territory, reputation and financial profits of the enterprise through murder, intimidation, violence, and threats of physical and economic harm;

c. Keeping victims and citizens in fear of the enterprise and its members and associates by: (i) identifying the enterprise, its members and associates, with La Cosa Nostra or the "Mafia"; (ii) causing and threatening to cause economic harm; and (iii) committing and threatening to commit physical violence;

d. Providing assistance to other DCF members who committed crimes on behalf of the enterprise, to hinder, obstruct, and prevent law enforcement officers from identifying, apprehending, and successfully prosecuting and punishing the offenders.

5. Each capo is responsible for supervising the criminal activities of his crew, and providing crew members and associates with support and protection. In return, the capo typically receives a share of the earnings of each of his crew's soldiers and associates. This share is sometimes called a "kick up." I am aware that CHARLES and ANTHONY STANGO's crew of the DCF is actively involved in, among other things, the distribution of controlled substances and the distribution of contraband cigarettes as means of enriching the enterprise and its members

6. Above the capos are the highest ranking members of the DCF. The head of the DCF is known as the "boss," and is normally assisted by an "underboss" and a "consigliere" or counselor. A "street boss" will sometimes run several crews at once. The boss, underboss, and consigliere are responsible for, among other things, setting policy, resolving disputes among members of the DCF, and resolving disputes between members of the DCF and members of other criminal organizations.

7. The boss, underboss, and consigliere of the DCF supervise, support, protect and discipline the capos, soldiers and associates, and regularly receive reports regarding their various activities. In return for their supervision and protection, the boss, underboss, and consigliere typically received part of the illegal earnings of each crew.

8. Since at least as early as 2012, a law enforcement agent acting in an undercover capacity ("the UC") has been able to infiltrate the DCF, and to gain the confidence of STANGO and others. The UC has posed as an "associate" of the DCF, which is as a person who works with and on behalf of the DCF, but who is not a full, or "made," member of the DCF. In the UC's current position, the UC acts as a person who operates a "crew" or group of other associates who work on behalf of the DCF. Other members of this "crew" include STANGO's son, ANTHONY STANGO, charged in Count Three of this complaint, and others.

9. In that position, the UC conveys orders from ranking, "made" members to his crew, and is responsible for "kicking up" or paying a tribute fee, to the capo or "caporegime" who is the fully made member of the DCF who oversees the operation of that crew. In this case, the capo to whom the UC pays tribute is STANGO.

10. During a meeting in New Jersey in October 2014, the UC recorded a conversation with STANGO. In that conversation, the UC and STANGO discussed the membership, structure and history of the DCF. A part of that recorded conversation set forth below confirms much of the information developed about the DCF. In this conversation, STANGO refers to "Goombah Frankie", believed to be FRANK NIGRO (the DCF consigliere) and "Milk", a DCF "street boss" not charged in this complaint.

STANGO (CS): Well what happens, I don't know if… my Goombah Frankie hates him. Gooms. [Background noise u/i]. Frankie, Frank my Goombah Frank and Milk…

UC: Yeah.

CS: Hate ain't even a good word. You got [s/l] c**k. One day he called they had to almost break it up. And my Goombah, I made my bones with my Goombah many moons. Okay? [laughs] Milk, Milk his whole f**kin', Milk's family was the root of the tree.

UC: Really?

CS: Oh he started this whole thing. [s/l It's been around a while now]. See his uncle the underboss of consiglieres since the beginning of time. They come right from Sicily to here.

UC: Yeah.

CS: This is sii… okay this proves he's the oldest crew in the country. They start, they originated the five families. Okay?

UC: Right.

CS: And now we run under the f**kin' Gambinos.

UC: Oh.

CS: Okay?

UC: Yeah.

CS: Heh.

UC: I didn't know that.

CS: Yeah.

UC: But now…

CS: Which is a good thing.

UC: What's the difference between Underboss and Consigliere? That doesn't seem…

CS: None. Consigliere represents he's the (ph) Representata for all the men.

UC: Okay.

CS: Okay?

UC: Alright alright.

CS: You gotta beef you can't go here. Before you can go oh rah, no you can't. You go to your skipper.

UC: Got ya.

CS: You go to your Capo. Your Capo, listen, I got a I got a thing. I'm not feelin' right. I'm wit ya you're doin' this you're doin' that you try to straighten that out. If you can't straighten that out you tell your Capo. "I wanna see the Consigliere."

UC: Oh okay.

CS: Then, you come to consigliere and you state your piece.

UC: Right right.

CS: And the consigliere and boss and underboss (background noise) when the f**kin' administration meets…

UC: Yeah.

CS: They don't count.

UC: Okay.

CS: We make a decision. They come when you can't make a decision.

UC: Ohh okay.

CS: Then…

UC: They could just help...

CS: Yeah yeah.

UC: They could help settle it.

CS: Yeah, yeah, yeah. That's what they do.

UC: So they're really supposed to be Switzerland. Right?

CS: What?

UC: If there's a problem they act as Switzerland? Right? They're like alright listen...

CS: Switzerland? What the f**k is that? Oh yeah, yeah, yeah...

UC: You know like neutral, like a neutral party.

CS: Oh, oh, oh.

UC: Like alright listen, we got this issue you have this issue let's come to a...

CS: But you can't (background noise) but you can't make a [ov]. Listen to me these guys here are from 1910. Milk and them.

UC: Wow.

CS: There's no if you're making a hundred thousand in their league okay and this [s/l] gesture. No. If you are making a hundred thousand a week and you're wrong and this guy ain't got three cents I know cause I'm makin', no.

UC: Alright yeah.

CS: Right is right and what's wrong is f**kin' wrong. And that's what they do. That's how we live.

UC: Yeah.

CS: Now me. I planted the f**kin' flag in f**kin' New Orleans, in Las Vegas, f**kin' L.A. okay?

PLAN TO KILL VICTIM-1

11. VICTIM-1, a/k/a "the Pet," a/k/a "the Mutt" ("V-1") is a "made" member of the DCF. There is currently a dispute among the current leadership of the enterprise as to whether V-1 was rightly "made." The dispute focuses on whether V-1's capo had the right to have V-1 "made" a member of the DCF. V-1 is alleged to be part of another

DCF "crew" run by the other DCF capo. V-1 maintains a residence in Elizabeth, New Jersey, and V-1's crew operates in the Elizabeth, New Jersey-area.

12. Since at least April, 2014, the UC engaged in a series of DCF- related meetings and exchanges with V-1. Subsequently, V-1 tried to claim the UC as a member of his crew which led to a dispute between V-1 and STANGO.

13. During a recorded, in-person meeting between the UC, STANGO, and others on October 20, 2014, STANGO and the UC discussed the fact that STANGO knew that the UC was having difficulty dealing with V-1. STANGO told the UC that V-1 had said that the UC was "bad," but that STANGO wanted the UC to continue to do business with V-1. STANGO instructed the UC to meet with V-1 to settle any differences. Later, V-1 accused the UC of being disloyal to the DCF, an accusation that angered STANGO.

14. On December 15, 2014, the UC met STANGO in Las Vegas. During the course of that meeting, which was recorded, STANGO explained to the UC that V-1 was the source of a "beef" or disagreement within the DCF. According to STANGO, V-1 had been "made" [officially become a full member of the DCF] by other leaders of the DCF, including the other crew's capo. However, in December 2014, STANGO was told by other members of the DCF that V-1 had insulted an acting boss of the DCF during the course of a social gathering. In addition, V-1 and STANGO had been involved in an ongoing disagreement over which of the two would control the UC's role within the DCF. As a result, STANGO concluded that V-1 was "out of control" and that he "had to meet death or you gotta maim him or you just gotta put him in a wheelchair for the rest of his life or somebody's gotta get a f**kin' jar of acid and throw it in his f**kin' face..." Later, STANGO told the UC that he expected that the UC would kill or maim V-1, or recruit someone to do it on his behalf.

15. On the following day, the UC again met with STANGO in person. During that meeting, which was recorded, STANGO again insisted that V-1 be killed or maimed by the UC or by someone on his behalf. During the course of the conversation, STANGO told the UC that one might consider throwing "a couple of pineapples" [plastic explosives] into V-1's place of business, or that "you stick up the joint [meaning V-1's business] you put twelve [i.e. bullets] in his nuts. Okay I'd take his legs out." Later STANGO stated "we got a problem in our house [the DCF] and we gotta straighten it out." When the UC questioned Stango as to what would happen if V-1 "gets gone" [killed], STANGO responded, "listen I don't give a f**k. If he gone gone I'll see ya later. They might give you fifty medals. They might give us fifty medals... whatever happens it came from me." STANGO added, "[B]ut this guy has to get maimed. He ain't gotta get killed." STANGO then continued, "I wanna blow him up" and that "this gotta be ended. This gotta be ended alright? And I don't want you there. No way around it."

STANGO suggested that the UC utilize a crew from outside of the Elizabeth, NJ area that would not be recognizable to local people to kill or maim V-1.

16. On or about December 20, 2014, the UC had a recorded conversation with STANGO, During that conversation, the UC asked STANGO, "and did you get a chance to talk to 'Milk' and tell him about the surprise party I'm throwin'?" STANGO replied that he did not because, at the time that STANGO was speaking with CC-2, he was uncomfortable discussing that plan with him. STANGO and the UC then continued to discuss the fact that the UC was planning a "surprise party" for V-1. The UC has told me that the term "surprise party," as used in this context, was a coded reference for the plan to kill V-1.

17. Beginning in January 2015, STANGO has engaged in telephone calls utilizing various cellular telephone facilities to discuss the DCF's business with other "made" members and associates. During that time, STANGO has participated in a number of recorded conversations with NIGRO, COLELLA [another DCF associate who frequently contacted NIGRO on STANGO's behalf], ANTHONY STANGO, and the UC about the DCF enterprise in general, and about the ongoing feud between STANGO and members of his crew and V-1 and members of his crew. Throughout the course of these conversations, STANGO has repeatedly expressed hatred for V-1 and members of his crew because of what he perceived to be their lack of respect for the DCF and its leaders. Further, STANGO has had specific discussions about his plan to kill V-1 with NIGRO, COLELLA and the UC.

18. On or about January 27, 2015 STANGO (in Nevada) engaged in a recorded conversation with ANTHONY STANGO (in New Jersey). During the course of that conversation, STANGO and ANTHONY STANGO discussed the ongoing dispute between STANGO and V-1 and members of V-1's crew. STANGO told ANTHONY STANGO that, "the whole world" knew about "the problem" with V-1 and that, "You get betrayed in that crew. You do the right thing you get betrayed." ANTHONY STANGO agreed that "... They're a bunch of back stabbing motherf**kers." STANGO concluded by warning that, "... I ain't going to let him f**k with me ever again, that's it, that's it, that's it. That's it. Ya know."

19. On or about January 29, 2015 STANGO (in Nevada) had a recorded conversation with COLELLA (in New Jersey). During the course of this conversation, STANGO told COLELLA about his simmering hatred for V-1, and that he wanted V-1 to disciplined because of his earlier display of disrespect to the acting boss of the DCF, a/k/a "Horse" in front of other family members at a social gathering at a social club in Elizabeth. In this

call, STANGO told COLELLA that anything short of violent retribution would be viewed as weakness. A portion of that call follows:

> CS: Right then and there he [the DCF acting boss] should have fu**ing start cracking him [V-1] and go. You know what I mean? And then the next day the same thing. And the next day and the next day. You understand? It's OK. I'd rather get beat up every day, but this motherfu**er here. Just one day we're gonna [UI] that's it. You can't do that. No. Jesus Christ. We're weak man.
>
> ***
>
> CS: This needs absolute attackness. OK? Win, lose or draw. Every day. Every f**ng day. 7 days. Him, in the garage, the fat f**k [V-1] that comes to the fu**ing club there. Every day. Every day. Until everybody stands at attention. You know. That's what I'd do. I'm [UI] die over this fu**ing thing. What could you do, what could you do, just uh.

20. On February 1, 2015, the UC met with Stango in Las Vegas, Nevada. During the course of the meeting, which was recorded, the UC and Stango discussed, among other things, the plan to kill V-1. In the course of the conversation, the UC confirmed that Stango wanted V-1 dead, and not merely injured. The UC and Stango then began to discuss the plan to kill V-1. The UC explained that, in keeping with Stango's suggestion during the course of the earlier conversation set forth in paragraph 15, two members of an outlaw motorcycle gang would be hired to shoot and kill V-1. Stango agreed and suggested that they pay each of the two men $25,000 to allow them to stay in the Elizabeth, NJ area for a period of time to be able to scout the area where the killing would occur, and to track V-1 in order to identify the best place to do so and effect their escape. Stango then provided the UC with two copies of a photograph of V-1 so that the assassins could mark their target. Importantly, the UC asked Stango what would happen in the event that other DCF members discovered that Stango and the UC were responsible for the killing. Stango assured the UC that other high-ranking members also wanted to kill V-1 and that, while the order to kill had come from Stango, others in the DCF would support the decision.

21. On February 3, 2015, STANGO had another recorded conversation with COLELLA. During that call, Stango told COLELLA that he needed COLELLA to speak with other ranking members of the DCF to advise them of STANGO'S plan to kill V-1, and to ensure that the killing would be approved by those members:

> Alright, they were here to see me okay. I got my guys. Okay. I gave them the pictures, today, the other day, yesterday. Alright. They left. They left uh this morning. Now, I'm in the process, they are out of town. I'm in the

process for them to go... They have been in and out of there already, but they are going in and out like it's going to be, like, like they know the back of their hand, you understand me okay?

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And uh, it's going to be like uh, you know, wherever, and it's going to be a lot of heat, wherever I see him. Wherever they see him. I wanna know if it's a yes or if it's a no. Okay?

***

But UI, he's got to let me know, yeah or nay because uh, I'm in the process of fu**ing you know, just doing what I do, okay, and uh, uh, uh, these guys are with me and um, and um strong with them. They don't even. They ain't even met them yet. 'Shipe' ain't seen them. Nobody's seen them. Nobody's knows them. You know. You might think the f**king angels are coming in from f**king hell or something, you understand? Okay. But they ride with the "BEEP" [a nickname STANGO used for himself in other contexts]. You know. So, unfortunately I really can't make this f**king uh, uh, uh, this trip, but uh you know but it's a done deal. You know I can't tell tomorrow or the next day but within the next 90 days if he tells me yeah, well you know I gotta get you know I gotta get bicycles. I got to get a lot of things, [UI], I need a few things which is I'm, I'm in the process of uh, getting you know what I mean. Before I f**king move, I mean, you know, cause gonna be enormous heat, you know.[UI]. They want it or or do I wait?

STANGO continued by proclaiming his loyalty to the DCF. COLELLA told STANGO that he would try to get an answer for him, and that he would call him back the next day with any information.

22. On February 5, 2015, STANGO had a recorded conversation with COLELLA in which he asked COLELLA if "you'll get to him what I told you, no?" COLELLA told STANGO that "Yeah. Just ahh...he basically..ah...do what you feel like you should do…Yeah. Then he said go over it again with him and the two of youz decide, whether yes or no, you know..." STANGO then insisted that COLELLA get a direct answer from the DCF leaders about the plan to kill V-1, and told COLELLA that "Once I put the light switch on it comes on" and that proceeding without the knowledge of others in the DCF was not "…a smart thing to do. I know when they're gonna be there."

23. On February 8, 2015, STANGO (in Nevada) had a recorded conversation with both NIGRO and COLELLA (in New Jersey). In the first part of the discussion, COLELLA and Stango engaged in the following conversation:

PC: Alright ... let's go over this that you want a yes or no on.
CS: Yeah. Okay. Listen.
PC: So he uh…so he has everything.
CS: Alright.
PC: Hold on. Hold on.

At that point, NIGRO and STANGO had the following conversation:

FN: Yeah, "Beeps" [STANGO]?
CS: Yeah the Mutt, okay? [Voice in background]
CS: You understand?
FN: How..?
CS: The Amazon [ph]? Or you wanna spray paint him? Okay? [I believe that the reference to "Amazon" in this context is a reference to killing V-1, while the term "spray painting" is a reference to merely shooting V-1]
FN: I didn't hear you. I can't hear you right.
***
CS: Nah, I understand that. I said, you want him in the Amazon (ph)? Or, you want him spray painted?
FN: [Laughing] Both. [Laughing]
CS: I know that [laughing] I f**king know that. I just, I just can't tell you, hey, you know, I am coming today. Alright? Could be anytime, anywhere. I don't want you to be eatin' on a f**kin', you know Monday or be there on Friday and you know what I mean? [warning NIGRO that he did not want him in proximity when the killing is set to occur]
FN: Yeah.
CS: That's all I am saying?
FN: Alright.
CS: You know, f-, you gotta let me know, because uh they were here last week. And I gave them the pictures. So now I am just uh, you know, I am gonna get set up. They've been in and outta there but now they are going to come in and outta there real regularly. [I

believe that this part of the conversation is a direct reference to the meeting between the UC and STANGO on February 1, 2015 in which they planned the killing].

NIGRO then asked STANGO when he was "coming in" and told him, "F-, for now just stop it." STANGO agreed and told NIGRO "Whatever you say. You just tell me go ahead and it's done."

24. On February 10, 2015 COLELLA and STANGO had another recorded conversation in which they discussed the ongoing dispute between STANGO and V-1. STANGO repeatedly told COLELLA that he was not "recognizing" either V-1 or his capo as official members of the DCF, and was not willing to meet with them to settle any differences. COLELLA agreed and told STANGO that, "Yeah well 'the Pet,' none of us recognize him." STANGO continued to reiterate that he would not be "recognizing" either V-1 or his capo and that he would not be pressured into doing so, even if it meant that he could be punished by other members of the DCF.

25. On February 14, 2015 STANGO and ANTHONY STANGO discussed the ongoing feud between STANGO and his crew and V-1 and others in V-1's crew. STANGO advised his son to stay away from V-1 and others in V-1's crew, and told him that he was waiting on "feedback uh from 'Milk'" as to "where the f**k we're at." Later STANGO told ANTHONY STANGO:

> If you come and bother me, well then you know. I don't wanna f**king, see these guys they don't want to go, go in the can, ya know, they're old, they're this and that ya know but...I just disagree what the f**k they're doing. I just want hey, I know we're going to get in a f**king beef so the best thing we can do is hey, listen, you go about you're business, you don't recognize me I don't recognize you and lets just leave it like that. You know, and then go pick on somebody else because you keep on picking here.. ya know the ending...either you're gonna kill me or I'm gonna kill you. Who the f**k needs that? You know what I mean? So ya know, go ahead son, knock yourself out.

26. On February 16, 2015 at 2:16 p.m., STANGO had a recorded conversation with COLELLA during which they discussed the fact that NIGRO had instructed COLELLA and STANGO that nothing was to be done to "Big Head" [V-1's capo]. In addition, they discussed the fact that the same instruction did not apply to V-1:

CS: Says [UI] flew out. I talked to 'Milk' yesterday, we were talking, bulls**tting yesterday. "Chops" might be coming out here.

PC: Alright.

CS: He'll probably talk to me, right?

PC: Yeah. You can say whatever you want about Pet.

CS: I can say anything I want.

PC: About Pet.

CS: About the other guy I can't.

PC: Keep it to yourself or keep it among us. You just can't.

CS: I understand that. Well what happened was, when 'Milk' called, I say, I ain't recognizing him or the guy that brought the message. What the f**k is going on here.

PC: The reason behind it. They're trying to keep him, 'the Pet'...

CS: I understand. I thought he wasn't with us a zillion percent.

PC: Yeah, no, They're trying to keep him over.

CS: I said the same thing.

PC: You know they're trying to keep him with us.

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PC: That's what me and Frankie [Nigro] talked about today. That's what Frankie said, the Pet doesn't, say whatever you want, doesn't matter.

CS: Cause he's still on the other side, it's just that Big Head is pettin' him, and uh, but does Big Head know I don't want to recognize him either? or No?

PC: No he didn't hear that. Tell him he can't say that. Among us, fine, but don't say nothin' to no one else. We ain't got no one else to replace Big Head. Stop and think about it.

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CS: I tell him, make sure you go with [NIGRO]. Bottom line is Cuz, do what I wanna do, don't say that to him no more, maybe f**kin' if [CC-2] said something to him or ah...

PC:	I don't think so.
CS:	Alright. I have to stop all of my movement with all that other bulls**t. Right?
PC:	Right.

Based upon the investigation, it is believed that this conversation reflects efforts by STANGO and others in the DCF to reach a consensus as to how to deal with V-1 and his capo and that the instructions for "Big Head" were different from those for V-1.

27. On February 22, 2015, STANGO was told by his live-in girlfriend that she believed, mistakenly, that V-1 was trying to call STANGO on her telephone.[1] Upon learning this, STANGO became irate, and made a series of telephone calls in which he discussed his hatred for V-1 and other associated with V-1's crew.

28. On February 22, 2015 at 2:14 p.m., STANGO had a partially-recorded conversation with NIGRO. During that call, the audio recording failed for a period of time and only the conclusion of the call during which NIGRO asked when STANGO was "coming in" and instructing him to "call McGruder" could be heard and recorded.

29. On February 22, 2015 at 2:16 p.m., STANGO and COLELLA spoke about the recent events pertaining to V-1 and the discussion that STANGO had with NIGRO. A portion of that call follows:

CS:	I just talked to [NIGRO] ya know?
PC:	Alright
CS:	Uh, I got this f**king mutt calling f**king [live-in girlfriend's] number
PC:	[Her] number?
CS:	Yeah . He's calling [her] trying to get me.
PC:	How'd he get her number?
CS:	I don't know. Maybe my dirty rotten muthaf**king nephew that should die as I speak, okay? Maybe that way, I don't know. okay, you understand?
PC:	Yeah
CS:	I have no f**king idea, but uh...I talked to [NIGRO] for a moment, "how are ya", I said, I just told em that this c**ksucker called and uh, um....he was asking me, gee, do you know when you're coming in, ya know? Ya know, I'm very busy here, okay? I wish I was

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[1] STANGO and others later realized that it was in fact NIGRO calling STANGO from a new telephone number.

coming in tomorrow morning I told him, ya know? [IA] This gotta end, gotta stop [IA]...this muthaf**ker cant go on...

PC: I'll call him later...I'll call him later and meet him tomorrow morning.

***

CS: Oh, alright, ya know...uh, uh ...I know he's still got the mindset, I know that, ya know.

PC: Yeah

CS: Asking me when I'm coming

***

CS: I hafta end this though, I gotta, this has to end... ya know I

PC: Yeah

CS: This has to end

PC: Yeah

CS: And it aint gonna be good either because I, I, ya know...this guy wants to test us in his 70's, this kid, well? Alright, I'm ready....[IA]

***

CS: My nephew...him...I mean uh , I mean...this guy here, like what did he do? He didn't bust [IA], who the f**k he beat up? who the f**ck he do anything, I don't see this guy doing nothing. Nothing.

PC: No

CS: Nothing at all, except ya know...screaming at old men, ya know, abusing old men, I can't believe my Goomba and his goomba went this f**king far, ya know what I mean?

PC: Yeah yeah

CS: I really can't, I mean ya know you got f**king uh, ya know. Got a lot of people working in the restaurant brother, I mean I ain't saying hey ya know you gotta throw it completely in the garbage and deep six it, let me put him in a chair...and when he gets better, put him in a chair again and let them wheel him around. No messages. There was no messages on there.

PC: Alright

CS: Heh wow, you're gonna [IA] muthaf**king, then I'm really gonna go. Nah, nah. Alright I just wanted to tell you that, he told me to call you, I'm gonna call you, ya know...call him later

PC: Okay

CS: ...I gotta get turned loose here, ya know I'm listening to him and I ain't doing nothing but uh uh this gotta end

PC: Yeah

CS: I ain't putting up with it, I don't give a f**k who it is. See me, I'm a "high noon guy" hey I'm coming, I'm coming wait there...be there with everybody I'm coming muthaf**ka..okay, I'm just coming and I'll be who the f**k I was born to be, ya know what I mean? Ya know? I don't know, I'm gonna see, we're gonna see how tough these muthaf**kers are, ya know, I ain't no f**king c*nt....telling you right now...I ain't gonna tell you [IA] ....., Colonel, they picked the wrong muthaf**ker, I'm telling ya

PC: [laughs]

CS: Alright, leave it like that and uh uh

PC: Okay

CS: Alright, I'll talk to you on next day or so

PC: Okay.

30. Later on February 22, 2015 STANGO and the UC had a recorded conversation in which STANGO described the earlier telephone calls, and that he now believed that he, NIGRO and the UC all shared the same "mindset" as to killing V-1. The UC and STANGO concluded by agreeing that they needed to meet in-person in Las Vegas. A portion of that call follows:

CS: We had a little thing here, you know, Shipe called [the live-in girlfriend], we thought it was the f**king that, you know, that f**king j**k-off. So, I had to come back and now this is Shipe's number. You know?

UC: You thought it was who calling?

CS: Oh, [UI] "the mutt."

UC: He called [the live-in girlfriend]?

CS: That's what we thought.

UC: Oh yeah?

CS: That's what we thought. Ok?

UC: Alright. Oh, ok. But it wasn't.

CS: But in the meantime when I got there, it was…

UC: It was Shipe.

CS: We couldn't figure it out. Yeah, it was Shipe.

UC: Oh, ok. Good thing you figured it out.

CS: Nah, nah, nah, it was a little flippy. And then Shipe called and I called him back, oh, when are you coming, he said? When the f**k are you coming here?

UC: Oh yeah?

CS: And yeah, yeah.

UC:	They probably need you, right?
CS:	**You know the mindset you had and still have?**
UC:	**Yeah.**
CS:	**Ok. That's the one they got and I got. Ok?**
UC:	**Ok. Good. Ok.**
CS:	**Alright, you understand?**
UC:	**Yeah.**
CS:	You might be here [Las Vegas] shortly? Huh?
UC:	I am coming. That's why I was calling you for. I found out probably by the weekend I'll be out there.

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31. On February 23, 2015 STANGO and ANTHONY STANGO engaged in a recorded conversation and discussed the fact that ANTHONY STANGO had received a text or other message from V-1 or another member of his crew, and that in the ensuing discussion, they insulted STANGO. STANGO responded angrily, and concluded by telling ANTHONY STANGO that they would continue the conversation over different telephones. A portion of that conversation follows:

AS:	Your f**king fat fu**ing nephew, and 'the dog' and the rest of those mother**kers. They keep sending the word that they are going to come see me. They want me to call and they want to talk this that and the other thing.
CS:	What do they want? What's going on?
AS:	They want to come see me. They want to come see me. They keep f**king sending word oh you better call [V-1], you better do this. I says listen.
CS:	Who said this?
AS:	They messaged [a person] on FaceBook, the kid [a member of V-1's crew] and [another member of V-1's crew] texted me and sent me a picture it's fu**ing [V-1 and three other members of V-1's crew]. I said listen f**k all of yous and where you came from. I told the kid […] listen this is why things are the way they f**king are.

***

AS:	You all run around and now you are all the best of friends. You want to come for me? Come on, come for me, he wants to fight me? Let's go. I don't give a f**k. I wish you all the best. You can

all go f**k yourselves, and have a nice f**king life. And that's it. I'll catch up to you f**king story telling rat bastards when I catch up to you.

***

AS: Yeah, he said, I'll tell you exactly what was sent to me. Hold on. Exactly what was sent to me. Our buddy said after all those talks and helping you out with this, you this how you ended up. Your father disowned you, called you a rat, and your wife was sucking d**k in f**king Bayway.

CS: Your father? Your father? Go ahead

AS: He pretty much wants you to go f**k yourself. And he wants to come see you in due time. And I tell him this is why things are the way they are, whatever you want to come see me come see me. I ain't running from none of yous. Pieces of s**t. F**king scum bag mother f**kers.

CS: There's a guy knows my situation like him and you're going to come disrespect my family huh. This is what you wanna do?

AS: This is what they wanna do.

CS: What's the f**king ending is it death? I don't know. I don't know what they f**k it is…

AS: That's how it's looking daddy, that's how it's looking… Because they are going to get a fu**ing beating. Anyone who fights me is going to get a beating I'll tell you that right now. I can speak for myself. I know I have a lot of tough guys with me but if they come at me I'm giving somebody a beating. Then they are going to come back harder, or god forbid I take a beating, I'm coming back harder so this ain't gonna f**kin'.

***

CS: Yeah. This has gotta end. This guy's got to end. Cause there ain't no talkin'. I can't talk. You know, I'm, I'm tryin' to fu**kin' uh go about our business...

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CS: We ain't recognizing him anymore. Tell him that came from me. Alright? And if you go to take a head of my house I'm gonna take 5 of yours. Alright? I don't even want to say this on this f**king phone.

AS: I'll call you from the other phone

32. Moments later there was another recorded conversation between STANGO and ANTHONY STANGO in which STANGO berated ANTHONY STANGO for engaging in conversation about V-1 over a phone, and further discussed the dispute between the crews. During the call, STANGO told his son that there was a possibility that V-1 could get shot in the head because he has a lot of enemies, though STANGO never said that he was ordering the shooting. The two also agreed to engage in another call in order to clean up the conversation described in paragraph 29. A portion of this conversation follows:

CS: Hey Anthony [ov]. You, you did a bad thing here. A bad thing. It is somethin', God forbid somebody, ah eh he don't have, he's [V-1] got a lot of enemies.
AS: Yeah.
CS: **What if this f**kin', you know, wha, what, what if my phone ain't no good? Somebody shoots this f**kin' guy in his head. What the f**k?** Are you gonna, what, what, what are they, what are you nuts or what I mean?
AS: This f**kin' guy.
CS: Yup. We ain't gonna give into him. You ain't respectin' my house we ain't respectin' yours. You like to lie, you like to f**kin' ah ya know. Ya know?
AS: Yep.
CS: Yeah we're gonna have to, you know I don't wanna get into this right now. I don't wanna hafta, ya know what I mean?

***

CS: Wrong thing on that phone Anthony. You did a wrong thing that you shoulda called me on this f**kin' phone. Believe me when I tell you shoulda called me on this f**kin' mother**kin' phone kid! Oh my God. Oh my God. You have no idea what you just did. You're gonna put me in the can [jail]. You f**kin' a**hole. This is f**kin' kid s**t!
AS: I'm sorry Dad. I called you in the heat of the moment.
CS: Yeah well it's no f**kin' good Anthony. **It's jail for me. Somebody shoots this motherf**ker they're gonna come and get me.** Okay? You should get me talking to where I'm f**kin', where I'm ya know, 'heat of the moment'. Wha, what the f**k layin' down I'm goin' and I hear this you know it's late I'm, I'm, I'm you know, you can't do that no more man.

***

CS: ...I mean ah you know eh, eh do I have to get into this f**kin' s**t now?

AS: No. I'm just, I'll call you from this phone from now on. I won't even call you on that phone.

CS: **Too late now. It's on, it's on the tape I'm dead.** You know? Shh.

AS: I could call you back on that phone and ta, ta, to tell ya I squashed everything. Everything is good.

CS: Alright. Nah I know. [ov] Nah, nah, nah that's ain't gonna happen. That ain't gonna happen.

***

AS: Should just go up there with a couple of guys catch him [V-1] in the f**kin' dark when he's goin' into his house. Motherf**ker.

CS: No you don't need to do that. You don't need to do none of that. Ya know, it, it, it's time to end him [V-1]...

***

CS: You don't know what's goin' on Anthony.

AS: Right.

CS: You have no idea what's goin' the f**k on and you came at me like this mother**ker! Phew! Phew! I can't believe you Ant. I just can't. (Ph) Phewsh you have no f**kin' clue you f**kin' jerk off. Wow, wow, wow, wow. Oh my God. You put me on the spot man.

AS: Daddy I'm so sorry.

CS: Didn't mean it? Ya, ya didn't mean it? But ...you're just a kid and don't understand what's goin' on. Ya understand? When somebody could go like this. Ya know? Phew! Jesus Christ. [Sighs] You know that's why I don't tell you nothin' at all. I'm tryin' to shut the f**k up just let it go and rah rah rah. You know but ah you don't know. **You have no idea. You don't even have a f**kin' clue! You put me right there. Wow and I'm three thousand miles away.** Ya know?

AS: Yeah I'm sorry Dad.

CS: That's it. You know there's nothin' to be sorry it's done it's done and that's it. I'll call you back on the other phone and eh you know... you know?

***

CS: Meet him. If he wants ya meet him and f**kin' win lose or draw go 'head. You got a couple guys that'll back ya right? F**k it.
AS: Yeah. I'm good.
CS: But it's best just to do that in, instead of all this cloak and dagger s**t. Okay? Now I gotta call you back on the other phone.
AS: Okay.

33. Moments later, STANGO and ANTHONY STANGO engaged in another recorded conversation over the same telephones utilized in the call set forth in paragraph 31. In this conversation, STANGO and ANTHONY STANGO attempted to mitigate any harm that might have been caused if the conversation in paragraph 31 was in fact monitored or recorded by law enforcement. A portion of that call follows:

AS: Hello.
CS: Anthony you know I was just thinkin', okay, ya know. You know before I was talkin' about the you know who called ya? What happened? All these kids up [ph] Edison. Listen, there's a f**kin' million guys that hate that f**kin' guy. Somebody could, cause something f**kin' happens. I don't want nothin' to happen to me. I ain't lookin' for no problems. I ain't gonna cause no f**kin' problems. Okay? Do ya understand? Alright?

AS: Yeah.

CS: And, and you know, just you know, try to be friends with everybody. I mean I overreacted before because I don't know you're, you're my son and, and you know. I don't want nothin' to happen.

***

CS: So you know it's ah and that's what, why I said the way I said. I got no bad intentions with this guy. I don't want you to have none and that's the way it is, do ya understand? Okay?
AS: Yes I understand.
CS: You know, you know just call try to make friends and just end it there. Okay? Ya understand? Ya understand?

***

34. On February 24, 2015 STANGO and the UC had another recorded conversation. During the course of that conversation, STANGO told the UC about the conversations that he had with ANTHONY STANGO the night before. The UC responded by telling

STANGO not to let ANTHONY STANGO meet V-1. STANGO agreed but told the UC that they needed to "end this s**t" and that "The ending ain't going to be good. Okay. They'll be no f**king...I'll take no prisoners. I'm going to take no prisoners." A portion of that call follows:

UC:	I know...I know...Um I talked to Whitey [ANTHONY STANGO].
CS:	Hold on a sec...hold on a sec. I'll talk to you when you get here tomorrow.
UC:	I know. I know. I don't want to get into it. I know. I just called you to let you know. He said he was going to.... going to see somebody. But I don't know if he should do that.
CS:	Well he can see anybody he wants. Let him go
UC:	I know.
CS:	Why not?
UC:	It's just you know. Well I hit the gas last night.
CS:	If you don't...Huh?
UC:	I stepped on the gas last night after I got that thing [text from the other crew]. He sent that to me last night.
CS:	Oh okay. That's good. That's all right. That's what I wanted you to do.
UC:	Yeah well.
CS:	When you get here I'll tell you more in depth.
UC:	Yeah yeah. But, I just wanted you to know. I don't know if he should be....
***	
UC:	Yeah. But I'm just afraid you know it's going to go bad down there. You know what I mean? I don't think they would. You know them better than me. I just don't want anything to happen.
***	
UC:	Okay. For a couple of things. Now is he going to do that? Well listen to me. I don't think so and I'll tell you why. All right.
UC:	um huh.
CS:	**The ending ain't going to be good. Okay. They'll be no f**king...I'll take no prisoners. I'm going to take no prisoners [IA]...**
***	
CS:	But Whitey will be all right. Whitey can take care. But he's gotta end this ....

UC:	Yeah yeah.
CS:	This has to get stopped. All right?
UC:	I know. But I'm just concerned. It's gonna. I know it's gonna. Very shortly it's gonna. So you know, I was just afraid to send him into the fu**ing Lion's den. You know?
CS:	I know. But…well, he's in and out of there all the time.
UC:	(Talk over one another) I gotta keep fu**ing planning party after party after party. I'm tired of fu**ing...it took me how long to plan one?
CS:	Yeah…
UC:	So I'm f**king done. The last thing I need to do. I'm done planning parties. You know? One f**king…
CS:	Yeah
UC:	**One f**king party and it's done.**
CS:	**Yeah I understand.**

The UC and STANGO continued to discuss the disrespect that had been shown when V-1's crew tried to contact STANGO by sending the message to ANTHONY STANGO. STANGO repeated that "It's just ain't going to be forgiven." Later, STANGO went on to explain how angry he had gotten because Anthony had discussed this matter over the telephone, and told the UC that he had sent an e-mail to cover it up. STANGO and the UC then talked about the plans that the UC had made to travel to Las Vegas, ostensibly to engage in a drug transaction involving another UC (UC-2). UC-2 was also the person that the UC represented was providing the shooters that were going to kill V-1. STANGO then offered to meet both the UC and UC-2 for lunch in Las Vegas.

CS:	Just pick a spot where uh where I can go for lunch. You understand? Where they're goin' then he could pick me up. I'll put jeans, put a hat and we go.
UC:	Okay. Yeah, yeah, yeah. Absolutely and uh oh you wanna go to lunch?
CS:	Well I tell, I will go with them ya know what I mean? I could go with you.
***	
UC:	Yeah yeah that'll be good and I'll tell him to pick a spot. Um [other UC], I'm tryin' to get to come. He said he might so.
CS:	Alright.

35. On February 25, 2015 STANGO and COLELLA engaged in a recorded conversation in which COLELLA told STANGO that he had gone to see NIGRO "yesterday," and that, "Everything's the same he went up Monday said everything's the same up there, no different feelings and uh, you know he mentioned the Pet…still working on what to do, that was it" STANGO then asked, "Yeah uh they ain't changed their mind now are they?" COLELLA replied, "Nah."

36. On March 1, 2015, the UC met STANGO in Las Vegas, and in a recorded conversation, the UC told STANGO that the UC had continued to plan the killing of V-1. STANGO then instructed the UC to call STANGO as soon as the killing occurred. A portion of that conversation follows:

CS: If you know like instantly, call me on the phone, 'yo okay.'

UC: Yeah.

CS: 'Done.'

UC: Mhmn.

CS: Alright.

UC: I'll tell you uhh… I'll tell you that she had to put her dog [nickname for V-1] down. Took her to the vet.

CS: You know if it's late…

UC: Yeah.

CS: Hit me the other thing [i.e. other phone].

UC: Oh yeah yeah yeah.

CS: Ya understand? You know hit the other thing and just go like 'it's great. Everything is great.'

UC: Yeah.

CS: I washed my face' [code for a successful hit on V-1]. That's all.

UC: Alright good.

37. On March 9, 2015, STANGO and the UC engaged in a recorded conversation. During the courses of that conversation, STANGO asked the UC if was still "looking for the things [guns]" to do "that thing, you washing your face [the previously set code for

the killing of V-1]…?" The UC then told STANGO that he was looking for one more "thing" with the "wheel [referring to a revolver-type handgun]" because "…they wanted two. One each." STANGO then replied, "Oh, backup, yeah." The UC then told STANGO that once he had the additional weapon, "they'll be ready" and that "[t]hey should be comin' in a couple hours." STANGO concluded that portion of the conversation by saying, "Alright."

CONSPIRACY TO OPERATE A PROSTITUTION BUSINESS

38. On February 10, 2015 the UC met with ANTHONY STANGO, MARIO GALLI, and two females at a bar in Toms River, NJ. During the course of that recorded meeting ANTHONY STANGO told the UC that he was going to set up a prostitution business as a means of generating income for himself and for the DCF. According to ANTHONY STANGO, the member of the crew present at the meeting and others were going to work in conjunction with the females present at the meeting in order to operate a high-end escort service that was going to target white collar businessmen and professionals in the area. During the meeting, he further told the UC that they were meeting so that the plan could be "on the books" [an officially recognized means of making money for the DCF].

39. On February 14, 2015, STANGO and ANTHONY STANGO had a recorded conversation during which they discussed how to set up the prostitution business to be run by ANTHONY STANGO's crew. A portion of the conversation follows:

CS: You need to protect yourself with what you're going to do now. You have to be smart, very smart, you can't just do something that everyone else is doing. ok? UI the services and be the same way and when you get bagged it's gonna be, ya know, it's gonna be f**ked up. You gotta know

AS: Yeah, nah, like we got it, we got it uh… ay know you got the lawyer that covers everything, everything is all f**king paperworked out, everybody signs a contract, what they do is what they do. You're paying me for their company. That's it. You know what I mean? That's all that it is. And that's totally and a hundred percent f**kin' legal. Ya know? They got something to say, here's my contract, every one of these f**king broads work for me, they sign the contract. You see what's in the contract? Everything is legal. No illegal business, no this, no that, you know what I mean? You can't hold me liable and then…

Finally, ANTHONY STANGO discussed other members of his "crew," including the individual who was present for the meeting with the UC on February 10.

40. On February 17, 2015 STANGO and ANTHONY STANGO had a recorded conversation in which they again discussed other members of ANTHONY STANGO's "crew" and the fact that they were going to establish a prostitution business. During the conversation, STANGO advised ANTHONY STANGO to establish a legal club as a front for the illegal prostitution business in order to avoid scrutiny by law enforcement. STANGO further advised his son to keep the drink prices reasonable in the club to generate profits, and to put out fund-raising materials that purported to be for wounded veterans but were to be kept as part of the profits for the DCF.

41. On February 16, 2015 STANGO and ANTHONY STANGO had another recorded conversation in which they discussed the previously described prostitution business. A portion of that call follows:

CS: What I am gonna tell you, you are gonna wind up going down. Alright? Ok? [UI] but you are gonna cause yourself a headache. And what I mean by this, you don't need no f**king storefront for that, ok? What you need, here is what you need. Before I tell you what you need [Conversation cuts out]

AS: I can't hear you.

CS: You see this project [UI] and you are getting this thing together, you are gonna use no hotel whatsoever. Ok?

AS: Ok.

CS: You don't never, ever, ever in your f**king life get comfortable with this. Ever.

AS: Right.

CS: Not one hour, not one day, don't tell me you know. ***

CS: ***. Alright. [UI] no set up. When you set up, here is how you set up, Anthony. Let's say you get everybody [UI] listen, ok? Alright? [UI] apartments, you gotta get yourself, you don't need a storefront for a club. You know what you need?

AS: What?

CS: You need like a small warehouse. ...

AS: Right.

CS: And you got the f**king garage in the back. You need something like a f**king a place off the f**king road. Ok? Like a warehouse where you can get in there and not where you f**king can hear your music and fu**king, you make it like a private joint. Where you gonna go in, where you can make a fu**king bar, it's off to the thing. Where you can have all them, all them you could have your company there but they come there. They bring people to drink. No sex, no drugs. No talking or nothing in that joint except you gotta a bar, they drink, they f**king, you know, you'll make a f**king G-note in a f**king day, just in a bar. Ok?

AS: Right.

CS: With some, you make the music, like f**king, not a f**king rap s**t, just soft s**t. Ok? Soft stuff where somebody can come. You got couches, you got f**king boobs, you got every f**king thing and it's a club. First, you go get the f**king paperwork to get it. You understand?

AS: Yeah.

CS: You could get the paperwork. What do I, and you don't do it half-ass it. What paperwork I need the club uh. Can you drink in the club. Ok? Can I drink? What's the rules here? OK? You find out what the rules are. So, if the bar was there, and uh you know heh, donations to the f**king, uh the wounded vets or something, for every drink.

AS: Right.

STANGO then continued to advise his son to use his crew to help operate the prostitution business. He then continued by saying:

CS: Ok. S**t like that. That's what you gotta get yourself together. You gotta, you are down there, you gotta be like a piece of sand on the beach. One, one with left handed s**t like you [UI] position you going into. And two, you gotta set up where you don't want 50 eyes on you like a storefront. There is f**king stores and there is people and there is that. You don't want none of that.

AS: Right.

CS: You want to be out of the way. Quietly [UI]. They come, you gotta tell the friends they come. [UI] it's a fu**king club. You understand? Ok? And that's it. You don't need, some [UI] you gonna go for 2,3, 400 a month. Ok? If you got f**king, if you got 20 people, you understand?

AS: Yeah.

CS: [UI] piece of f**king month. 1200, 100 for the day. You know what I mean? You's gotta to move. Ok? But you can't move out of there. Ok?

AS: Right.

CS: You can't move like with Mario's business. You go by Johnny Balls' business. None of that come out of there. ["Business" as used here, based upon other intercepted calls, refers to drug sales conducted by the other crew members]

AS: Right.

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CS: Cause all, all hell is gonna break loose soon. So, that's what you say to her. Go get the license for the joint. You's around all day. You know, make a call, what do I need to get to open up a club. It's a social club. Ok? And if we have a bar in there, what, what, you know, what is that consist. You can have a bar in the club, you can [UI] drinking. Yeah, Ok. You understand? Call up a lawyer. Find out what the f**k you can do and you can't do. And get ready to set that up. Ok?

AS: Alright.

CS: You understand? If you, if you got 3 guys, 4 guys, 5 guys, ok, and you got your f**king main 5 guys in there, everybody, you know, however you want to do it. You know, but it can be done smartly. You gotta, you got a base of operation in all areas, but you can't run no dope out of there, kid.

AS: Alright.

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42. On February 21, 2015 STANGO and ANTHONY STANGO again discussed the prostitution business in a recorded conversation. A portion of that call follows:

CS: Yeah.

AS: Yeah. I got a lawyer. I got a f**king criminal lawyer, real good f**king guy [UI] is banging a f**king friend of mine. He's going to put all of this in f**king order for me and everything. Take care of every f**king thing we are gonna do on Monday. Told me I gotta do it. He's going to set up the LLCs and all that s**t. He is going to do everything.

CS: Well, just give him a f**king in.

AS: Well, yeah. When you charge 350 an hour, 550 an hour whatever, that 50 goes into escrow to, right to the lawyer. So, God forbid.

CS: [UI] 350 an hour. Who the f**k is 350 an hour. Oh, the broads get 350 an hour?

AS: No, we charge 350. That's, that's our [UI]. They pay us. Whatever the broads charge, whatever they want after that, that's on them. [UI]

CS: [UI]

AS: These girls, they've been doing this. You know what I mean? [UI] but he is also bringing the clientele, lawyers, he's got doctor friends, a bunch of s**t.

CS: Yeah. Listen to me, what do they pay for these f**king broads? [UI]

AS: They pay, they pay us 350. Ok? And then the broads charge a 100, a 150 whatever the f**k for whatever. You know what I mean? They are paying for an hour. They don't pay for anything less than an hour. Even if they are there half an hour, they bust their f**king nut. That's it, the girls leave, they are all done. You know what I mean?

CS: Well, my point is, you get more than the women are getting. That's greed.

AS: No, that's, that's the hourly [UI]. Yeah, but, they, they get taken care out of that. Out of that hour, we got to pay, they are paying for their f**king safety. They are paying for all of that. That's, this is all in agreement already. I, we sat down with all of them, me and [a female] talked about all of this to all of them and, and that's it.

They are good with that. See, they are protected under our company, under the LLC. They are protected by the lawyer. You know? We have lawyers. The lawyers got the f**king bonds, he says, if anyone gets jammed up, you call me, they put it right on my credit cards. That's it.

CS: You can't, you can't talk this on a regular phone either.

AS: I know, not at all. The lawyer only talks to me in person. And I got, I got dirt on him, too. He is from down here. He is from, from Ocean County. Got dirt on him, those pictures, everything. So, I am covered every way around. Something goes bad, go. These pictures you know where they are going.

CS: [UI] that's what I am saying. You…

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CS: I know what you are trying to do. I am just saying. Be like you see at the beach. Be a grain of sand on the whole f**king beach. This way when they look, they see the beach. They don't see ANTHONY. They don't see MARIO. They can't pick us out of f**king a 1000 people. You understand? Ok, so, my point being, be a grain of sand on the beach. Ok? The bulls and the bears, Anthony, they survive. The pigs they get slaughtered. Ok? Always go for a f**king bologna sandwich. Ok? You know? Don't go for the french fries and f**king steaks and s**t. Just get the bologna sandwich. If you got five bologna sandwiches, you're eating pretty good. Yeah.

AS: Absolutely.

CS: You picking up 500 a shot, you know what I mean, come on, that's 125,000 a year tax free. That's like having 250,000. You understand. And you haven't left your fat f**king [UI] yet. … off the couch.

43. On March 3, 2015 STANGO and ANTHONY STANGO engaged in a recorded conversation during which they discussed the prostitution business they are attempting to establish. A portion of that call follows:

CS: Yeah that's are what you're doing, just with the regulars, ok, you understand

AS: Right

CS: They want a quick 'pipe job', they come down, Bing! You understand, and that's it, ya know?

AS: You know, we want we want the out call because that's where we make the most money, its 350 an hour plus the [IA] ...with a spot, with a spot like that it would have to be, OK you're paying

CS: I'm just, I'm just giving you...

AS: Yeah, yeah

CS: I'm just giving you an idea, but listen, I don't know who's gonna pay yous 500 a shot [IA] f**k that...

AS: You gotta see these broads

CS: What do ya got, 1, 2?

AS: One, two? What do you mean? I got 12 here, 5 in New York and 8 out in Philly.

CS: Yeah, well

AS: I got 'em all sizes and colors, all prices...I got cheapees that you gotta pay me 100 an hour for ... gotta give you a $30 f**king blowjob , and the I got f**king broads that you're gonna pay me 350 to 500 an hour

CS: How you gonna operate all that son?

AS: We got a website going up, it'll be up this week, ya know for bachelor parties and uh companion services and the whatever the f**k else. And then you go through there, everything goes through f**king prepaid. When the girls get there, the girls don't go in...the guys go in first, ya know they look around...if its if its f**king bad, they make a f**king decision there ...You know, you call for one girl, there's only one guy in the room, nobody else can be in the room, nobody else to be there. That's why my guys go there, they look around, they get paid and then they go outside and they wait.

CONSPIRACY TO DISTRIBUTE CONTROLLED SUBSTANCES

44. On December 12, 2014, the UC met ANTHONY STANGO at a location in Union, New Jersey. During the course of the meeting, which was audio and video recorded, STANGO gave the UC a cardboard box, containing a Wendy's fast food bag, which in turn contained plastic bags containing a quantity of suspected cocaine. In exchange, the UC provided STANGO with $11,200 as payment for the cocaine. An examination of the suspected cocaine revealed that the substance was in fact cocaine and weighed approximately 197.5 grams.

45. On December 22, 2014, the UC met STANGO and JOHN CAPOZZI at a location in Union, New Jersey. During the course of the meeting, which was audio recorded, STANGO and CAPOZZI gave the UC a paper towel wrapped around a clear, sealed plastic bag containing a quantity of suspected cocaine. In exchange, the UC provided STANGO and CAPOZZI with $11,200 as payment for the cocaine. An examination of the suspected cocaine revealed that the substance was in fact cocaine and weighed approximately 199.9 grams

46. On December 30, 2014, the UC met STANGO and CAPOZZI at a location in Union, New Jersey. During the course of the meeting, which was audio recorded, STANGO and CAPOZZI gave the UC a Christmas gift bag inside of which was a clear sealed bag which contained a quantity of suspected cocaine. In exchange, the UC provided STANGO and CAPOZZI with $11,200 as payment for the cocaine. An examination of the suspected cocaine revealed that the substance was in fact cocaine and weighed approximately 199.2 grams.

47. On January 5, 2015, the UC met STANGO and CAPOZZI at a location in Union, New Jersey. During the course of the meeting, which was audio recorded, STANGO and CAPOZZI gave the UC a Ziploc bag containing a quantity of suspected cocaine. In exchange, the UC provided STANGO and CAPOZZI with $11,200 as payment for the cocaine. An examination of the suspected cocaine revealed that the substance was in fact cocaine and weighed approximately 199.7 grams.

48. On January 16, 2015, the UC met STANGO, CAPOZZI and an unidentified female at a location in Freehold, New Jersey. During the course of the meeting, which was audio recorded, STANGO and CAPOZZI gave the UC a plastic container inside of which was a sealed bag containing a quantity of suspected cocaine. In exchange, the UC provided STANGO and CAPOZZI with $11,200 as payment for the cocaine. An examination of the suspected cocaine revealed that the substance was in fact cocaine and weighed approximately 199.0 grams.

49. On February 19, 2015, the UC met STANGO, CAPOZZI and MARIO GALLI at a location in Union, New Jersey. During the course of the meeting, which was audio recorded, STANGO, CAPOZZI and GALLI gave the UC a Converse shoe box inside of which was a Ziploc bag containing a quantity of suspected cocaine. In exchange, the UC provided STANGO, CAPOZZI and GALLI with $11,000 as payment for the cocaine. An

examination of the suspected cocaine revealed that the substance was in fact cocaine and weighed approximately 199.5 grams.

50. On February 25, 2015, the UC met STANGO, JOHN CAPOZZI and MARIO GALLI at a location in Union, New Jersey. During the course of the meeting, which was audio recorded, a third male identified by CAPOZZI as "Nick" (later identified as DEGIDIO) delivered a quantity of suspected cocaine to STANGO, CAPOZZI and GALLI. STANGO, CAPOZZI, and GALLI in turn gave the UC a Target shopping bag, inside of which were two more plastic bags containing a quantity of suspected cocaine. In exchange, the UC provided STANGO, CAPOZZI, and GALLI with $11,000 as payment for the cocaine. An examination of the suspected cocaine revealed that the substance was in fact cocaine and weighed approximately 200.0 grams.

51. During a series of recorded conversations beginning on February 26, 2015, ANTHONY STANGO and STANGO discussed the fact that "Johnny Balls" and "Mario" were members of a group of individuals who were loyal to him and were willing to confront members of a rival group if called upon to do so. Further, during the course of those recordings, ANTHONY STANGO was instructed by STANGO not to allow "Mario" or "Johnny Balls" to conduct their "business" in the club being developed by ANTHONY STANGO and STANGO so that their fledgling prostitution business could avoid scrutiny by law enforcement. STANGO later explicitly instructed ANTHONY STANGO not to allow the distribution of "dope" inside the club's premises. ANTHONY STANGO acknowledged that instruction and agreed not to allow them to conduct their activity inside the club.

52. On March 6, 2015, STANGO and the UC engaged in a recorded conversation. During the conversation, the UC told STANGO that he was planning to meet ANTHONY STANGO and JOHN CAPOZZI. The UC told STANGO that he was going to instruct ANTHONY STANGO and JOHN CAPOZZI that another individual known to STANGO was going to be the primary supplier of the crew's cocaine in the future. A portion of that call follows:

CS: ***Alright... now, what'd you, you were runnin' around today?
UC: Yeah I ran around today just tryin' to get a lot of s**t done. I gotta see Whitey [ANTHONY STANGO] in a little while and Balls [JOHN CAPOZZI] [coughs] I gotta sit down with him and talk to him about what

we talked about [referring to future drug deals] and lay it out for him. I'll let him know...

CS: Yeah lay it out for him, lay it out for his goomba just go 'head let's go.

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53. On March 6, 2015, the UC met STANGO, JOHN CAPOZZI and MARIO GALLI at a location in Union, New Jersey. During the course of the meeting, which was audio recorded, DEGIDIO delivered a quantity of suspected cocaine to STANGO, CAPOZZI and GALLI. STANGO, CAPOZZI and GALLI in turn provided that cocaine to the UC. In exchange, the UC provided STANGO, CAPOZZI, and GALLI with $27,500 as payment for the cocaine. An examination of the suspected cocaine revealed that the substance was in fact cocaine and weighed approximately 524.7 grams.

54. During the course of this meeting, law enforcement agents conducted surveillance of a residence in Union, New Jersey. During the course of the surveillance, the agents saw a white Mercedes-Benz SUV pull into the driveway of the residence. The agents saw a male fitting the description of DEGIDIO and unidentified female get out of the Mercedes and enter the premises. A short time later, the same male went to the side of the house out of the view of the agents, toward a door that leads to the basement of the house. Within a short time, the same male emerged carrying a plastic bag, and got into the white Mercedes. The agents then followed the white Mercedes for a short distance, until the vehicle parked on a street corner.

55. A short time later, the UC met ANTHONY STANGO and GALLI at another location in Union, New Jersey for the purpose of buying 500 grams of cocaine. ANTHONY STANGO and GALLI entered the UC's car, and the UC drove to a second location in Union where he parked adjacent to the same white Mercedes. After the UC parked the car, he saw CAPOZZI standing next to the driver's side window of the Mercedes, talking with DEGIDIO who was seated in the driver's seat. The UC handed ANTHONY STANGO the money to pay for the cocaine and watched ANTHONY STANGO walk to the white Mercedes where ANTHONY STANGO handed the money to DEGIDIO. The UC then saw DEGIDIO hand a FedEx box to CAPOZZI, who in turn handed it to ANTHONY STANGO. ANTHONY STANGO and CAPOZZI then entered the UC's vehicle at which time ANTHONY STANGO handed the UC the FedEx box inside of which was a plastic bag which contained a quantity of suspected cocaine.

56. A search of a database of the New Jersey Motor Vehicle Commission revealed that the white Mercedes-Benz was registered to DEGIDIO. A photograph of DEGIDIO was obtained from the same database and shown to the UC. The UC confirmed that the photograph was of the same person that met with the UC on March 6 and was the same

person who delivered the cocaine to ANTHONY STANGO, CAPOZZI and GALLI during the February 25, 2015 purchase.

57. During the course of the recorded conversation after the purchase of cocaine on March 6, the UC told ANTHONY STANGO, CAPOZZI, and GALLI that CHARLES STANGO had directed him to make the individual identified in the conversation in paragraph 52 the supplier of the cocaine being sold by the crew. The UC told that they would have access of up to as much as 20 kilograms of cocaine at a time.

58. On March 7, 2015, STANGO and ANTHONY STANGO engaged in a recorded conversation. During the course of that conversation, ANTHONY STANGO protested that there was no need for the other individual referred to in paragraphs 52 and 55 to be used to as the crew's cocaine supplier. ANTHONY STANGO told STANGO that they were dealing the "powder" through "Balls" and "Balls' guy." ANTHONY STANGO went on to assure STANGO that "Johnny" and "his guy" have been "doing this for a very long time…these guys are very careful" and then went on to describe how the last transaction with the UC was conducted.

59. A short time later, STANGO and the UC engaged in a recorded conversation during which STANGO told the UC to "keep doing what you're doing" with "Whitey and "Balls."

60. On March 9, 2015, STANGO and the UC engaged in a recorded conversation during which STANGO again told the UC to continue to deal with "Whitey" and "them kids" and specifically instructed the UC not to attempt to deal with the third individual in order to supply the cocaine for the crew.

61. Later on March 9, 2015, STANGO and ANTHONY STANGO engaged in a recorded conversation during which ANTHONY STANGO described in detail the means by which the cocaine that the group was selling had been smuggled into the country, and the prices that they were paying per kilogram for the cocaine. In addition, ANTHONY STANGO described his access to other controlled substances, including MDMA to STANGO. STANGO then told ANTHONY STANGO to be careful, and instructed him to let the other members of the crew be the persons actively involved in the drug transactions.